

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CYNTHIA ENID BETANCOURT COLON

DEBTOR

CASE NO 15-05006-BKT

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN  
AND CERTIFICATE OF SERVICE**

**TO THE HONORABLE COURT:**

**NOW COMES, CYNTHIA ENID BETANCOURT COLON**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays:

1. The debtor is hereby submitting a proposed amended Plan, dated September 18, 2015, herewith and attached to this motion.
2. This proposed amended Plan is filed to amend provisions for secured creditor Banco Popular Puerto Rico and First Bank Puerto Rico, and to provide for secured creditor Asociacion Residentes Caminito.

**WHEREFORE** debtor respectfully requests the confirmation of the requested amended Plan, dated September 18, 2015.

**I CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor in the above captioned case, and to all creditors and parties in interest appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 18<sup>th</sup> day of September, 2015.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186  
CAGUAS PR 00726  
TEL. NO. (787) 744-7699

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 3:15-bk-5006

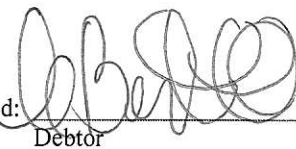
BETANCOURT COLON, CYNTHIA ENID

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>9/18/2015</u>	
<input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>		<b>II. DISBURSEMENT SCHEDULE</b>	
$\$ \quad 620.00 \times 15 = \$ \quad 9,300.00$		A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____	
$\$ \quad 730.00 \times 45 = \$ \quad 32,850.00$		B. SECURED CLAIMS:	
$\$ \quad \times = \$$		<input type="checkbox"/> Debtor represents no secured claims.	
$\$ \quad \times = \$$		<input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:	
$\$ \quad \times = \$$		1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:	
TOTAL: \$ <u>42,150.00</u>		Cr. <u>Banco Popular De P</u> Cr. _____	
Additional Payments:		# <u>8120700959281</u> # _____	
\$ _____ to be paid as a LUMP SUM		\$ <u>6,590.84</u> \$ _____	
within _____ with proceeds to come from:		2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims:	
<input type="checkbox"/> Sale of Property identified as follows:		Cr. <u>Asociacion Resident</u> Cr. <u>FirstBank Of Puerto</u> Cr. _____	
_____		# <u>907</u> # <u>Claim 2-1</u> # _____	
<input type="checkbox"/> Other:		\$ <u>394.34</u> \$ <u>28,282.76</u> \$ _____	
_____		3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:	
Periodic Payments to be made other than, and in addition to the above:		Cr. _____ Cr. _____ Cr. _____	
\$ _____ x _____ = \$ _____		# _____ # _____ # _____	
PROPOSED BASE: \$ <u>42,150.00</u>		\$ _____ \$ _____ \$ _____	
<b>III. ATTORNEY'S FEES</b>		4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:	
(Treated as § 507 Priorities)		5. <input type="checkbox"/> Other:	
Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,868.00</u>		6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:	
Signed: 		<u>Oriental Pension Co</u> <u>Banco Popular De P</u>	
Debtor		C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.	
Joint Debtor		11 U.S.C. § 507 and § 1322(a)(2)	
		D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.	
		1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____	
		<input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____	
		Cr. _____ Cr. _____ Cr. _____	
		# _____ # _____ # _____	
		\$ _____ \$ _____ \$ _____	
		2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
		OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)	
		* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."	
		* Debtor to provide ADEQUATE PROTECTION PAYMENTS to First Bank Puerto Rico through the Trustee in the sum \$175.00 per month until confirmation, and to be paid retroactive to the date of the filing of the petition.	
		* Trustee will pay First Bank Puerto Rico (POC 2-1) concurrently with attorney's fees in a 50/50% basis.	
		* Debtor to provide auto insurance (Eastern America Insurance Company) upon maturity to First Bank Puerto Rico through the Plan.	
		* BPPR Claim #3-1; debtor proposes to pay pre and post-petition arrears (including July/2015 post-petition payment) through the Trustee; debtor to commence making current direct mortgage loan payments to BPPR in August/2015.	

Attorney for Debtor R. Figueroa Carrasquillo Law Office

Phone: (787) 744-7699

Label Matrix for local noticing  
0104-3  
Case 15-05006-BKT13  
District of Puerto Rico  
Old San Juan  
Fri Sep 18 15:21:49 AST 2015

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C/O SERGIO A. RAMIREZ DE ARELLANO LAW OF  
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End of Label Matrix  
Mailable recipients 22  
Bypassed recipients 0  
Total 22